Message

From: Stuber, Robyn [Stuber.Robyn@epa.gov]

Sent: 7/24/2018 11:20:59 PM

To: Siebels, Thomas@Waterboards [Thomas.Siebels@waterboards.ca.gov]; Morris, Cris@Waterboards

[Cris.Morris@waterboards.ca.gov]

CC: Smith, DavidW [Smith.DavidW@epa.gov]; Stuber, Robyn [Stuber.Robyn@epa.gov]

Subject: RE: Request for Comments on the Tentative Waste Discharge Requirements for Shell Oil Products US-Carson

Distribution Facility (CA0000809)

Hi Cris and Thom,

I took a quick look at the PN permit and noted the final sediment WLAs applicable to the discharge (i.e., TMDL Tables 6-11 for cadmium and 6-13 for chlordane and dieldrin, both in mg/kg dry sediment) are incorporated as performance goals (i.e., permit Table 6), rather than the required final WQBELs (or interim effluent limits and final WQBELs with compliance schedules). As a result, the permit's approach does not appear to follow NPDES regulations regarding WQBELs based on approved WLAs (40 CFR 122.44(d)(1)(vii)(B)).

Can we schedule a call on Thursday (July 26) to discuss? My calendar is open except from 2:30-3:30.

Thanks, Robyn

ROBYN STUBER • 415-972-3524 • M/T/Th/F USEPA R9 • NPDES PERMITS SECTION (WTR-2-3) 75 HAWTHORNE STREET • SAN FRANCISCO, CA 94105

From: Siebels, Thomas@Waterboards [mailto:Thomas.Siebels@waterboards.ca.gov]

Sent: Monday, July 23, 2018 4:05 PM

To: Siebels, Thomas@Waterboards < Thomas. Siebels@waterboards.ca.gov >

Cc: Stuber, Robyn <Stuber.Robyn@epa.gov>; Mitschele, Becky <Mitschele.Becky@epa.gov>; Mr. Kenneth Wong, U.S. Army Corp of Engineers <kenneth.wong@usace.army.mil>; Bryant.Chesney@noaa.gov; Mr. Jeff Phillips, U.S. Fish and Wildlife Service <jeff_phillips@fws.gov>; Paznokas, William@Wildlife <William.Paznokas@wildlife.ca.gov>; Bergquist, Sutida@Waterboards <Sutida.Bergquist@waterboards.ca.gov>; Henry, Teresa@Coastal <Teresa.Henry@coastal.ca.gov>; Mr. Tommy Smith, Los Angeles County Department of Public Works <tsmith@dpw.lacounty.gov>; Mr. Theodore Johnson, Water Replenishment District of Southern California <tjohnson@wrd.org>; Mr. Angelo Bellomo, Los Angeles County Department of Health Services

<abellomo@ph.lacounty.gov>; Ms. Sylvie Makara, Heal the Bay <smakara@healthebay.org>; Ms. Annelisa Moe, Heal the Bay <amoe@healthebay.org>; Mr. Bruce Reznik, Los Angeles Waterkeeper <Bruce@lawaterkeeper.org>; Mr. Arthur Pugsley, Los Angeles WaterKeeper <arthur@lawaterkeeper.org>; Ms. Melissa Kelly, Los Angeles WaterKeeper <arthur@lawaterkeeper.org>; Ms. Joan Matthews, NRDC

<jmatthews@nrdc.org>; James Ashby <james.ashby@pgenv.com>; Ms. Sarah Torres, PG Environmental
<sarah.torres@pgenv.com>; lisa.barfield@shell.com; Elliott.Ripley@shell.com; Owens, Cassandra@Waterboards
<Cassandra.Owens@waterboards.ca.gov>; Morris, Cris@Waterboards <Cris.Morris@waterboards.ca.gov>; Chen, Jau
Ren@Waterboards <Jauren.chen@waterboards.ca.gov>; Carlos, Alex@Waterboards <alex.carlos@waterboards.ca.gov>
Subject: Request for Comments on the Tortative Waster Discharge Requirements for Shell Oil Broducts US Carson

Subject: Request for Comments on the Tentative Waste Discharge Requirements for Shell Oil Products US-Carson Distribution Facility (CA0000809)

Interested Parties

Summary: Pursuant to the federal Clean Water Act, as amended, and in accordance with the Water Code, tentative waste discharge requirements have been prepared for Equilon Enterprises LLC dba Shell Oil Products US, Shell Oil Products US-Carson Distribution Facility (CA0000809). In accordance with administrative procedures, the California

Regional Water Quality Control Board, Los Angeles Region (Regional Board), at a public hearing to be held on September 13, 2018, will consider the attached tentative requirements and comments submitted in writing regarding any and all portions thereof. Written submissions pertaining to the proposed Regional Board action must be submitted to Regional Board staff no later than 5:00 p.m. on August 22, 2018. Attached please find the following documents related to this matter:

Cover Letter
Tentative Requirements
Instruction Sheet for Public Notice
Public Notice
Statement of Posting Notice

The Regional Board Watershed Regulatory Section is sending our correspondence with PDF Format through email. You will not receive a hard copy unless you are addressee of the correspondences or you do not have an email address. If you want a hard copy to be sent to you, please contact our staff.

The attached document is in Adobe Acrobat PDF format. You can obtain an Acrobat Reader free of charge at http://www.adobe.com/products/acrobat/readstep2.html.

Thomas J. Siebels
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Industrial Permitting Unit
California Regional Water Quality Control Board
Los Angeles Region
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